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7 Attorneys for Complainant

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation/Petition to
12 Revoke Probation Against:

12 CYNTHIA NORRIS-WILLIAMS
13 aka CYNTHIA MORRIS
2804 Via Avanti Street
14 Henderson, Nevada 89014

Respondent.

Case No. 2009-85

**ACCUSATION/PETITION TO
REVOKE PROBATION**

15
16 Complainant alleges:

17 **PARTIES**

18 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) brings this Petition to Revoke
19 Probation solely in her official capacity as the Executive Officer of the Board of Registered
20 Nursing, Department of Consumer Affairs.

21 2. On or about March 31, 1983, the Board of Registered Nursing issued
22 Registered Nurse License Number 359387 to Cynthia Norris-Williams a.k.a. Cynthia Morris
23 (Respondent). The Registered Nurse License was in effect at all times relevant to the charges
24 brought herein and will expire on March 31, 2009, unless renewed.

25 3. In a disciplinary action entitled "In the Matter of Accusation and Petition to
26 Revoke Probation Against Cynthia M. Norris-Williams," Case No. 2001-131, the Board of
27 Registered Nursing, issued a decision, effective July 27, 2001, in which Respondent's Registered
28 Nurse License was revoked. However, the revocation was stayed and Respondent's license was

1 placed on probation for a period of three (3) years with certain terms and conditions. A copy of
2 that decision is attached as Exhibit A and is incorporated by reference.

3 JURISDICTION

4 4. This Accusation and Petition to Revoke Probation is brought before the Board
5 of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the
6 following laws. All section references are to the Business and Professions Code unless otherwise
7 indicated.

8 STATUTORY PROVISIONS

9 5. Section 2750 of the Business and Professions Code (Code) provides, in
10 pertinent part, that the Board may discipline any licensee, including a licensee holding a
11 temporary or an inactive license, for any reason provided in Article 3 (commencing with section
12 2750) of the Nursing Practice Act.

13 6. Section 2764 of the Code provides, in pertinent part, that the expiration of a
14 license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding
15 against the licensee or to render a decision imposing discipline on the license. Under section
16 2811(b) of the Code, the Board may renew an expired license at any time within eight years after
17 the expiration.

18 7. Section 2761 of the Code states:

19 "The board may take disciplinary action against a certified or licensed nurse or
20 deny an application for a certificate or license for any of the following:

21 (a) Unprofessional conduct, which includes, but is not limited to, the following:

22 (4) Denial of licensure, revocation, suspension, restriction, or any other
23 disciplinary action against a health care professional license or certificate by another state or
24 territory of the United States, by any other government agency, or by another California health
25 care professional licensing board. A certified copy of the decision or judgment shall be
26 conclusive evidence of that action."

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8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

ACCUSATION

FIRST CAUSE FOR DISCIPLINE

(Discipline by Another California Health Care Professional Licensing Agency)

9. Respondent is subject to disciplinary action under Code section 2761, subdivision (a)(4), on the grounds of unprofessional conduct, in that Respondent has been disciplined by the Nevada State Board of Nursing. Effective January 29, 2004, the Nevada State Board of Nursing revoked respondent's Nevada Nurse License, pursuant to the decision issued in *In the Matter of Cynthia Norris-Williams, RN Licensed Professional Nurse Nevada License No. RN22460* before the Nevada State Board of Nursing, attached hereto as **Exhibit B** and incorporated herein.

PETITION TO REVOKE PROBATION

10. Grounds exist for revoking the probation and reimposing the order of revocation of Respondent's Registered Nurse License No. 359387. Condition 14 of the Stipulated Settlement and Disciplinary Order states, in pertinent part:

If Respondent violates the conditions of her probation, the Board after giving the Respondent notice and an opportunity to be heard, may set aside the stay order and impose the stayed discipline (revocation/suspension) of the Respondent's license.

If during the period of probation, an accusation or petition to revoke probation has been filed against Respondent's license or the Attorney General's Office has been requested to prepare an accusation or petition to revoke probation against Respondent's license, the probationary period shall automatically be extended and shall not expire until the accusation or petition has been acted upon by the Board.

11. Respondent has violated the Probation Program, as more particularly set forth in the following paragraphs:

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1 **FIRST CAUSE TO REVOKE PROBATION**

2 **(Tolling of Probation)**

3 12. At all times after the effective date of Respondent's probation, Condition 5
4 stated:

5 Respondent shall be bound by the terms and conditions of the Disciplinary
6 Order at its effective date. Respondent currently resides in Nevada and
7 practices in California. Should respondent cease the practice of registered
8 nursing in California, probation shall be tolled and said period will not
9 apply to the reduction of this probationary term. The respondent must
10 provide written notice to the Board within 15 days of any change of
11 residency or practice outside this state.

12 13. Respondent's probation is subject to revocation because she failed to comply
13 with Probation Condition 5, referenced above. The facts and circumstances regarding this
14 violation are as follows:

15 A. Respondent failed to produce evidence to the Board of employment in
16 California during her probation. At all times that respondent was placed on probation, she did
17 not submit for approval any evidence of employment in California. Consequently, respondent's
18 probation has been tolled for failing to practice with approval of the Board in California.

19 **SECOND CAUSE TO REVOKE PROBATION**

20 **(Employment Approval)**

21 14. At all times after the effective date of Respondent's probation, Condition 9
22 stated:

23 Respondent shall obtain prior approval from the Board before
24 commencing any employment, paid or voluntary, as a registered nurse.
25 Respondent shall cause to be submitted to the Board all performance
26 evaluations and other employment related reports as a registered nurse
27 upon request of the Board.

28 Respondent shall provide a copy of this decision to his or her employer
and immediate supervisor prior to commencement of any nursing or other
health care related employment.

Respondent shall notify the Board in writing within seventy-two hours
(72) after she obtains any nursing or other health care related employment,
when such employment is not as registered nurse. Respondent shall notify
the Board in writing within seventy-two hours after she is terminated from
any registered nursing, other nursing, or other health care related
employment with a full explanation of the circumstances surrounding the
termination.

1 15. Respondent's probation is subject to revocation because she failed to comply
2 with Probation Condition 9, referenced above. The facts and circumstances regarding this
3 violation are as follows:

4 A. Respondent commenced employment without obtaining prior approval
5 or submitting work performance evaluations at the following facilities:

- 6 1. King Drew (Martin Luther King Hospital)
- 7 2. Daniel Freeman Memorial
- 8 3.. USC University Hospital
- 9 4. Century City Doctor's Hospital
- 10 5. St. John's Health Center
- 11 6. Long Beach Memorial
- 12 7. Centinela Hospital
- 13 8. Good Samaritan Hospital
- 14 9. Lakewood Regional Medical
- 15 10. California Hospital
- 16 11. Brotman Hospital
- 17 12. Huntington Memorial Hospital
- 18 13. St. Francis Medical Center
- 19 14. Mission Community Center
- 20 15. Little Company of Mary (Torrance)
- 21 16. Queen of Angels/Hollywood Presbyterian Hospital
- 22 17. Olympia Medical Center
- 23 18. St Vincent Medical Center

24 B. Respondent failed to notify the Board in writing within 72 hours of
25 obtaining employment of the facilities listed above.

26 C. Respondent failed to cause to be submitted the required work
27 performance evaluations.

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1 **THIRD CAUSE TO REVOKE PROBATION**

2 **(Supervision)**

3 16. At all times after the effective date of Respondent's probation, Condition 10
4 stated:

5 Respondent shall obtain prior approval from the Board regarding
6 Respondent's level of supervision and/or collaboration before
7 commencing or continuing any employment as a registered nurse, or
8 education and training that includes patient care.

9 Respondent shall practice only under the direct supervision of a
10 registered nurse in good standing (no current discipline) with the
11 Board of Registered Nursing, unless alternative methods of
12 supervision and/or collaboration (e.g., with an advanced practice
13 nurse or physician) are approved.

14 Respondent's level of supervision and/or collaboration may include, but is
15 not limited to the following:

16 (a) Maximum - The individual providing supervision and/or
17 collaboration is present in the patient care area or in any other work setting at all
18 times.

19 (b) Moderate - The individual providing supervision and/or collaboration
20 is in the patient care unit or in any other work setting at least half the hours
21 Respondent works.

22 (c) Minimum - The individual providing supervision and/or collaboration
23 has person-to-person communication with Respondent at least twice during each
24 shift worked.

25 (d) Home Health Care - If Respondent is approved to work in the home
26 health care setting, the individual providing supervision and/or collaboration shall
27 have person-to-person communication with Respondent as required by the Board
28 each work day. Respondent shall maintain telephone or other telecommunication
contact with the individual providing supervision and/or collaboration as required
by the Board during each work day. The individual providing supervision and/or
collaboration shall conduct, as required by the Board, periodic, on-site visits to
patients' homes visited by Respondent with or without Respondent present.

17 17. Respondent's probation is subject to revocation because she failed to comply
18 with Probation Condition 10, referenced above. The facts and circumstances regarding this
19 violation are as follows:

20 Respondent failed to obtain approval and to practice under supervision in any of
21 positions she held as set forth more specifically above in paragraph 15 A.

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1 **FOURTH CAUSE TO REVOKE PROBATION**

2 **(Worked for a Nurse Registry)**

3 18. At all times after the effective date of Respondent's probation, Condition 11
4 stated:

5 Respondent shall not work for a nurse's registry, in any private
6 duty position as a registered nurse, a temporary nurse placement
agency, a traveling nurse, or for an in-house nursing pool.

7 Respondent shall not work for a licensed home health agency as a
8 visiting nurse unless the registered nursing supervision and other
9 protections for home visits have been approved by the Board.
Respondent shall not work in any other registered nursing
occupation where home visits are required.

10 Respondent shall not work in any health care setting as a
11 supervisor of registered nurses. The Board may additionally
restrict Respondent from supervising licensed vocational nurses
and/or unlicensed assistive personnel on a case-by-case basis.

12 Respondent shall not work as a faculty member in an approved
13 school of nursing or as an instructor in a Board approved
14 continuing education program.

15 Respondent shall work only on a regularly assigned, identified and
predetermined worksite(s) and shall not work in a float capacity.

16 If Respondent is working or intends to work in excess of 40 hours
17 per week, the Board may request documentation to determine
whether there should be restrictions on the hours of work.

18 19. Respondent's probation is subject to revocation because she failed to comply
19 with Probation Condition 11, referenced above. The facts and circumstances regarding this
20 violation are as follows:

21 A. Respondent obtained employment through four nurse registries,
22 ATC, Secure Nursing, M.S.S., and Renaissance Nursing.

23 B. Respondent failed to work at a regularly assigned, identified,
24 and predetermined worksite.

25 C. She failed to inform the Board that she worked in excess of 40
26 hours per week.

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OTHER MATTERS

As a factor in aggravation complainant alleges the following: On or about March 25, 2008, respondent was terminated from employment at Little Company of Mary Hospital in Torrance and listed on the "Do Not Return" list. Furthermore, on or about March 28, 2008, respondent was terminated from employment at California Hospital Medical Center and listed on the "Do not Send" list, and on or about September 11, 2006, respondent was terminated and listed on the "Do not Send" list for USC University Hospital.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking the probation that was granted by the Board of Registered Nursing in Case No. 2001-131 and imposing the disciplinary order that was stayed thereby revoking Registered Nurse License No. 359387 issued to Cynthia Norris-Williams a.k.a. Cynthia Morris;
2. Revoking or suspending Registered Nurse License No. 359387, issued to Cynthia Norris-Williams, a.k.a. Cynthia Morris;
3. Taking such other and further action as deemed necessary and proper.

DATED: 10/9/08

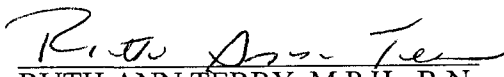

RUTH ANN TERRY, M.P.H., R.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

Exhibit A

Decision and Order

Board of Registered Nursing Case No. 2001-131

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation)
Against:)
CYNTHIA M. NORRIS-WILLIAMS) Case No. 2001-131
2804 AVANTI STREET)
HENDERSON, NEVADA 89014)
RN LICENSE NO. 359387)
Respondent)
_____)

ORDER CORRECTING CLERICAL ERROR IN
STIPULATED SETTLEMENT AND ORDER

On its own motion, the Board of Registered Nursing finds that there is a clerical error in the Stipulated Settlement and Order in the above-entitled matter and that such clerical error should be corrected so that the respondent's registered nurse license number in the stipulation and order corresponds with the respondent's registered nurse license number.

IT IS HEREBY ORDERED that the registered nurse license number contained in the Decision in the above-entitled matter be and hereby is amended and corrected nunc pro tunc as of the date of entry of the decision to read as follows:

"Registered Nurse License Number 359387."

IT IS SO ORDERED this 10th day of July, 2001.

Board of Registered Nursing
Department of Consumer Affairs
State of California

Ruth Ann Terry MPH, RN
RUTH ANN TERRY, MPH, RN
Executive Officer

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

CYNTHIA M. NORRIS-WILLIAMS
2804 Avanti Street
Henderson, Nevada 89014

Respondent.

Case No. 2001-131

OAH No. N-2000120097

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing of the Department of Consumer Affairs, as its Decision in the above entitled matter.

This Decision shall become effective on July 27th, 2001.

It is so ORDERED June 27th, 2001.

Sandra L. Erickson

FOR THE BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS

BILL LOCKYER, Attorney General
of the State of California
ELENA L. ALMANZO, State Bar No. 131058
Deputy Attorney General
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Attorneys for Complainant

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

CYNTHIA M. NORRIS-WILLIAMS
2804 Avanti Street
Henderson, Nevada 89014

Respondent.

Case No. 2001-131

OAH No. N-2000120097

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
above-entitled proceedings that the following matters are true:

PARTIES

1. Complainant Ruth Ann Terry, M.P.H., R.N. is the Executive Officer of the
Board of Registered Nursing. She brought this action solely in her official capacity and is
represented in this matter by Bill Lockyer, Attorney General of the State of California, by Elena
L. Almanzo, Deputy Attorney General.

2. Respondent is representing herself in this proceeding and has chosen not
to exercise her right to be represented by counsel.

3. On or about March 31, 1983, the Board of Registered Nursing issued
Registered Nurse License Number 22460 to Cynthia M. Norris-Williams ("Respondent"). At all

1 relevant times said license has been in effect and shall expire on March 31, 2003, unless
2 renewed.

3 JURISDICTION

4 4. Accusation No. 2001-131, was filed before the Board of Registered
5 Nursing of the Department of Consumer Affairs, ("Board"), and is currently pending against
6 Respondent. The Accusation, together with all other statutorily required documents, was duly
7 served on Respondent on November 3, 2000, and Respondent timely filed a Notice of Defense
8 contesting the Accusation. A copy of Accusation No. 2001-131 is attached as Exhibit A and
9 incorporated herein by reference.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read and fully understands the nature of the
12 charges and allegations in the Accusation and the effects of this Stipulated Settlement and
13 Disciplinary Order.

14 6. Respondent is fully aware of her legal rights in this matter, including the
15 right to a hearing on the charges and allegations in the Accusation, the right to be represented by
16 counsel, at her own expense, the right to confront and cross-examine the witnesses against her,
17 the right to present evidence and to testify on her own behalf, the right to the issuance of issuance
18 of subpoenas to compel the attendance of witnesses and the production of documents, the right to
19 reconsideration and court review of an adverse decision, and all other rights accorded by the
20 California Administrative Procedure Act and other applicable laws.

21 7. Respondent voluntarily, knowingly and intelligently waives and gives up
22 each and every right set forth above.

23 CULPABILITY

24 8. Respondent understands that the charges and allegations in the
25 Accusation, if proven at a hearing, constitute cause for imposing discipline upon her Registered
26 Nurse license.

27 9. Respondent admits the truth of each and every charge and allegation in the
28 Accusation No. 2001-131.

10. Respondent agrees that her Registered Nurse License is subject to discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the Order below.

CONTINGENCY

11. This stipulation shall be subject to the approval of the Board. Respondent understands and agrees that Board of Registered Nursing's staff and counsel for Complainant may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent. If the Board fails to adopt this stipulation as its Order, except for this paragraph the Stipulated Settlement and Disciplinary Order shall be of no force or effect, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

12. The parties agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the original Stipulated Settlement and Disciplinary Order and signatures.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board shall, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Registered Nurse License Number 22460 issued to Respondent Cynthia M. Norris-Williams is revoked. However, the revocation is stayed and Respondent is placed on probation for three (3) years on the following terms and conditions.

(1) SEVERABILITY CLAUSE - Each term and condition of probation contained herein is a separate and distinct term and condition. If any term and condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each term and condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

1 (2) OBEY ALL LAWS - Respondent shall obey all federal, state and local laws. A full
2 and detailed account of any and all violations of law shall be reported by the respondent to the
3 Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of
4 compliance with this term, respondent shall submit completed fingerprint cards and fingerprint
5 fees within 45 days of the effective date of the decision, unless previously submitted as part of
6 the licensure application process. Respondent shall submit a recent 2" x 2" photograph of herself
7 within 45 days of the effective date of the final decision.

8 (3) COMPLY WITH PROBATION PROGRAM - Respondent shall fully comply
9 with the terms and conditions of the Probation Program established by the Board and cooperate
10 with representatives of the Board in its monitoring and investigation of the respondent's
11 compliance with the Probation Program. Respondent shall inform the Board in writing within no
12 more than 15 days of any address change and shall at all times maintain an active, current license
13 status with the Board, including during any period of suspension.

14 (4) REPORT IN PERSON - Respondent, during the period of probation, shall appear in
15 person at interviews/ meetings as directed by the Board or its designated representatives.

16 (5) RESIDENCY OR PRACTICE OUTSIDE OF STATE - Respondent shall be
17 bound by the terms and conditions of the Disciplinary Order at its effective date. Respondent
18 currently resides in Nevada and practices in California. Should respondent cease the practice of
19 registered nursing in California, probation shall be tolled and said period will not apply to the
20 reduction of this probationary term. The respondent must provide written notice to the Board
21 within 15 days of any change of residency or practice outside the state.

22 (6) SUBMIT WRITTEN REPORTS - Respondent, during the period of probation,
23 shall submit or cause to be submitted such written reports/declarations and verification of actions
24 under penalty of perjury, as required by the Board. These reports/declarations shall contain
25 statements relative to respondent's compliance with all the terms and conditions of the Board's
26 Probation Program. Respondent shall immediately execute all release of information forms as
27 may be required by the Board or its representatives.

28 (7) PROVIDE DECISION - Respondent shall provide a copy of this decision to the

nursing regulatory agency in every state and territory in which she has a registered nurse license.

(8) **FUNCTION AS A REGISTERED NURSE** - Respondent, during the period of probation, shall engage in the practice of registered nursing in California for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

For purposes of compliance with the section, "engage in the practice of registered nursing" may include, when approved by the Board, volunteer work as a registered nurse, or work in any non-direct patient care position that requires licensure as a registered nurse.

The Board may require that advanced practice nurses engage in advanced practice nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

If respondent has not complied with this condition during the probationary term, and the respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of the respondent's probation period up to one year without further hearing in order to comply with this condition.

(9) **EMPLOYMENT APPROVAL AND REPORTING REQUIREMENTS** -

Respondent shall obtain prior approval from the Board before commencing any employment, paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all performance evaluations and other employment related reports as a registered nurse upon request of the Board.

Respondent shall provide a copy of this decision to his or her employer and immediate supervisor prior to commencement of any nursing or other health care related employment.

Respondent shall notify the Board in writing within seventy-two (72) hours after she obtains any nursing or other health care related employment, when such employment is not as a registered nurse. Respondent shall notify the Board in writing within seventy-two (72) hours after she is terminated from any registered nursing, other nursing, or other health care related employment with a full explanation of the circumstances surrounding the termination.

(10) **SUPERVISION** - Respondent shall obtain prior approval from the Board regarding respondent's level of supervision and/or collaboration before commencing any employment as a

1 registered nurse.

2 Respondent shall practice only under the direct supervision of a registered nurse in good
3 standing (no current discipline) with the Board of Registered Nursing, unless alternative methods
4 of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are
5 approved.

6 Respondent's level of supervision and/or collaboration may include, but is not limited to
7 the following:

8 (a) Maximum - The individual providing supervision and/or collaboration is present in the
9 patient care area or in any other work setting at all times.

10 (b) Moderate - The individual providing supervision and/or collaboration is in the patient care
11 unit or in any other work setting at least half the hours respondent works.

12 (c) Minimum - The individual providing supervision and/or collaboration has person-to-person
13 communication with respondent at least twice during each shift worked.

14 (d) Home Health Care - If respondent is approved to work in the home health care setting, the
15 individual providing supervision and/or collaboration shall have person-to-person
16 communication with respondent as required by the Board each work day. Respondent shall
17 maintain telephone or other telecommunication contact with the individual providing supervision
18 and/or collaboration as required by the Board during each work day. The individual providing
19 supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits
20 to patients' homes visited by the respondent with or without respondent present.

21 (11) **EMPLOYMENT LIMITATIONS** - Respondent shall not work for a nurse's
22 registry, in any private duty position as a registered nurse, a temporary nurse placement agency,
23 or for an in-house nursing pool;

24 Respondent shall not work for a licensed home health agency as a visiting nurse unless
25 the registered nursing supervision and other protections for home visits have been approved by
26 the Board. Respondent shall not work in any other registered nursing occupation where home
27 visits are required.

28 Respondent shall not work in any health care setting as a supervisor of registered nurses.

1 The Board may additionally restrict respondent from supervising licensed vocational nurses
2 and/or unlicensed assistive personnel on a case-by-case basis.

3 Respondent shall not work as a faculty member in an approved school of nursing or as an
4 instructor in a Board approved continuing education program.

5 Respondent shall work only on a regularly assigned, identified and predetermined
6 worksite(s) and shall not work in a float capacity.

7 If the respondent is working or intends to work in excess of 40 hours per week, the Board
8 may request documentation to determine whether there should be restrictions on the hours of
9 work.

10 (12) COMPLETE A NURSING COURSE(S) - Respondent, at her own expense, shall
11 enroll and successfully complete a course(s) relevant to the practice of registered nursing no later
12 than six months prior to the end of his or her probationary term.

13 Respondent shall obtain prior approval from the Board before enrolling in the course(s).
14 Respondent shall submit to the Board the original transcripts or certificates of completion for the
15 above required course(s). The Board shall return the original documents to respondent after
16 photocopying them for its records.

17 (13) COST RECOVERY - Respondent shall pay to the Board costs associated with its
18 investigation and enforcement pursuant to Business and Professions Code Section 125.3 in the
19 amount of \$795.00. Respondent shall be permitted to pay these costs in a payment plan
20 approved by the Board, with payments to be completed no later than three months prior to the
21 end of the probation term.

22 (14) VIOLATION OF PROBATION - If a respondent violates the conditions of her
23 probation, the Board after giving the respondent notice and an opportunity to be heard, may set
24 aside the stay order and impose the stayed discipline (revocation/suspension) of the respondent's
25 license.

26 If during the period of probation, an accusation or petition to revoke probation has been
27 filed against respondent's license or the Attorney General's Office has been requested to prepare
28 an accusation or petition to revoke probation against the respondent's license, the probationary

1 period shall automatically be extended and shall not expire until the accusation or petition has
2 been acted upon by the Board. Upon successful completion of probation, the respondent's
3 license will be fully restored.

4 ACCEPTANCE

5 I have carefully read the above Stipulated Settlement and Disciplinary Order and I
6 fully understand the terms and conditions and other matters contained therein, I understand the
7 effect this stipulation will have on my Registered Nurse License. I enter into this Stipulated
8 Settlement voluntarily, knowingly and intelligently and agree to be bound by the Disciplinary
9 Order and Decision of the Board of Registered Nursing. I further agree that a facsimile copy of
10 this Stipulated Settlement and Disciplinary Order, including facsimile copies of signatures, may
11 be used with the same force and effect as the originals.

12 DATED: 3-26-01.

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15 CYNTHIA M. NORRIS-WILLIAMS
16 Respondent
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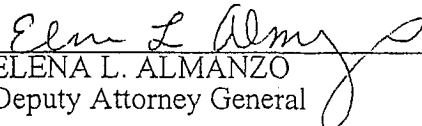
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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

DATED: 4/11/01

BILL LOCKYER, Attorney General
of the State of California


ELENA L. ALMANZO
Deputy Attorney General

Attorneys for Complainant

DOJ Docket Number:03579-110-SA00AD1555

Exhibit A:

Accusation Case No. 2001-131

BILL LOCKYER, Attorney General
of the State of California
ELENA L. ALMANZO, State Bar No. 131058
Deputy Attorney General
California Department of Justice
1300 I Street, Suite 125
P.O. Box 944255
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Attorneys for Complainant

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 2001-131

CYNTHIA M. NORRIS-WILLIAMS
2804 Via Avanti Street
Henderson, Nevada 89014

A C C U S A T I O N

Registered Nurse License No. 359387

Respondent.

Complainant alleges:

PARTIES

1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Accusation solely in her official capacity as the Executive Officer of the Board of Registered Nursing, Department of Consumer Affairs.

2. On or about March 31, 1983, the Board of Registered Nursing issued Registered Nurse License Number 359387 to CYNTHIA M. NORRIS (now CYNTHIA M. NORRIS-WILLIAMS "Respondent"). The Registered Nurse license will expire March 31, 2001.

STATUTORY PROVISIONS

3. Business and Professions Code section 2750 ("Code") states, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 of the Nursing Practice Act.

1 4. Section 2764 of the Code states, in pertinent part, that the expiration of a
2 license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding
3 against the licensee or to render a decision imposing discipline on the license.

4 5. Section 2811(b) of the Code states, in pertinent part, that the Board may
5 renew an expired license at any time within eight years after the expiration.

6 6. Section 118(b) of the Code states, in pertinent part, that the expiration of a
7 license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the
8 period within which the license may be renewed, restored, reissued or reinstated.

9 7. Section 125.3 of the Code states, in pertinent part, that a Board may
10 request the administrative law judge to direct a licensee found to have committed a violation or
11 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
12 and enforcement of the case.

13 8. Section 2761 of the Code states the board may take disciplinary action
14 against a certified or licensed nurse or deny an application for a certificate or license for any of
15 the following:

16 (a) Unprofessional conduct, which includes, but is not limited to, the following:

17 (4) Denial of licensure, revocation, suspension, restriction, or any other
18 disciplinary action against a health care professional license or certificate by another state or
19 territory of the United States, by any other government agency, or by another California health
20 care professional licensing board. A certified copy of the decision or judgment shall be
21 conclusive evidence of that action.

22 FIRST CAUSE FOR DISCIPLINE

23 (Out of State Discipline)

24 9. Respondent is subject to disciplinary action under Code section 2761(a)(4)
25 on the grounds of unprofessional conduct in that effective March 4, 1998, the Nevada State
26 Board of Nursing placed respondent's Nevada Registered Professional Nurse license on
27 probation for one year. The Board's action was based on patient abandonment, failing to
28 accurately document patient records, falsifying or otherwise altering or destroying records,

1 and/or failing to perform nursing functions in a manner consistent with established or customary
2 standards. Respondent failed to comply with one or more of the terms and conditions set forth in
3 the probation order in that on November 13, 1998, respondent failed to contact a physician
4 concerning a patient's potentially harmful situation. On March 4, 1999, the Nevada State Board
5 of Nursing revoked respondent's Nevada Registered Professional Nursing license for two years
6 effective March 26, 1999. On or about February 9, 2000, the Nevada State Board of Nursing
7 upon reconsideration, reduced respondent's revocation from two years to one year.

8 PRAYER

9 WHEREFORE, Complainant requests that a hearing be held on the matters herein
10 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 11 1. Revoking or suspending Registered Nurse License Number 359387, issued
12 to Cynthia M. Norris-Williams;
- 13 2. Ordering Cynthia M. Norris-Williams to pay the Board of Registered
14 Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to
15 Business and Professions Code section 125.3;
- 16 3. Taking such other and further action as deemed necessary and proper.

17
18
19 DATED: Oct. 31, 2000
20
21
22

23 Ruth Ann Terry
24 RUTH ANN TERRY, M.P.H., R.N.
25 Executive Officer
26 Board of Registered Nursing
27 Department of Consumer Affairs
28 State of California
Complainant

EXHIBIT B
NEVADA STATE BOARD OF NURSING
COMPLAINT AND NOTICE OF HEARING
ORDER OF PROBATION
FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER

1 **BEFORE THE NEVADA STATE BOARD OF NURSING**

2
3
4 IN THE MATTER OF

5 CYNTHIA NORRIS-WILLIAMS, RN

6 LICENSED PROFESSIONAL NURSE

7 NEVADA LICENSE NO. RN22460

8 RESPONDENT

COMPLAINT AND NOTICE
OF HEARING

CASE NO.: 0501-99C

9
10 The Nevada State Board of Nursing (Board), by and through counsel, Frederick R.
11 Olmstead, hereby notifies Respondent Cynthia Norris-Williams of an administrative hearing,
12 which is to be held pursuant to Chapters 233B and 632 of the Nevada Revised Statutes and
13 Chapter 632 of the Nevada Administrative Code. The purpose of the hearing is to consider the
14 allegations stated below and to determine if the Respondent should be subject to an
15 administrative penalty as set forth in NRS 632.320 and/or NRS 632.325 and/or NAC 632.926-
16 .927, if the stated allegations are proven at the hearing by the evidence presented.

17 Respondent Cynthia Norris-Williams is currently and at the times mentioned herein,
18 licensed as a Registered Nurse in the State of Nevada and is, therefore, subject to the jurisdiction
19 of the Board and the provisions of NRS Chapter 632 and NAC Chapter 632.

20 IT IS HEREBY ALLEGED AND CHARGED AS FOLLOWS:

21 I.

22 In March 1998, Respondent was placed on a one year term of probation based upon an
23 Order of the Board. The term of probation was imposed because of issues of patient
24 abandonment and falsification of charting.

25 II.

26 In March 1999, the Board revoked Respondent's license for two years due to
27 Respondent's failure to comply with the terms and conditions of the probation imposed in March
28 1998.

1 III.

2 In January 2001, the Board accepted Reinstatement of License and issued an Order of
3 Disciplinary Probation. The term of Respondent's new probation was to be three years.

4 IV.

5 Since having her License reinstated, Respondent has failed to comply with the terms of
6 her probation in the following ways:

- 7 1. Failure to submit quarterly self-reports since June 2002.
- 8 2. Failure to attend a NSBN meeting within the first year of the execution of the
9 Order of Disciplinary Probation (March 2002).
- 10 3. Failure to submit quarterly documentation verifying attendance at a Board
11 approved Nurse Support Group.

12 V.

13 The foregoing conduct constitutes grounds for disciplinary action pursuant to NRS
14 632.320(14) because Respondent has willfully failed to comply with a regulation; subpoena, or
15 order of the board.

16 Based on the foregoing:

17 PLEASE TAKE NOTICE, that a disciplinary hearing has been set to consider this
18 Administrative Complaint against the above-named Respondent in accordance with Chapters
19 233B and 632 of the Nevada Revised Statutes and Chapter 632 of the Nevada Administrative
20 Code.

21 THE HEARING WILL TAKE PLACE on **January 22, 2004, commencing at 1:30**
22 **p.m.**, or as soon thereafter as the Board is able to hear the matter, at the **Nevada State Museum**
23 **and Historical Society, 700 Twin Lakes Drive, Las Vegas, Nevada 89107.** This case and
24 other matters are scheduled to be heard by the Board.

25 PURSUANT TO NRS 632.350, Respondent may request, in writing, that the Board
26 furnish copies of communications, reports, and affidavits in its possession, regarding the above-
27 referenced matter.

1 As the Respondent, you are specifically informed that you have the right to appear and be
2 heard in your defense, either personally or through counsel of your choice. You have the right to
3 respond and to present relevant evidence and argument on all issues involved. You have the
4 right to call and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on
5 any matter relevant to the issues involved.

6 You have the right to request that the Board issue subpoenas to compel witnesses to
7 testify and/or evidence to be offered on your behalf. In making this request, you may be required
8 to demonstrate the relevancy of the witness' testimony and/or evidence.

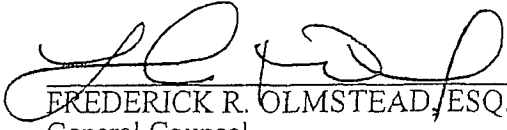
9 The purpose of the hearing is to determine if the Respondent has violated NRS
10 632.320(14), and if the allegations contained herein are substantially proven by the evidence
11 presented to further determine what administrative penalty is to be assessed against the
12 Respondent, if any, pursuant to NRS 632.320 and/or NRS 632.325 and/or NAC 632.926-.927.

13 Should the Respondent fail to appear at the hearing, a decision may still be reached by
14 the Board. As the Respondent, you are further advised that you may be charged with cost
15 associated with the hearing pursuant to NRS 632.325(1)(c).

16 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by
17 stipulation, agreed settlement, consent order, or default. Any attempt to negotiate this case
18 should be made through Frederick R. Olmstead, General Counsel, Nevada State Board of
19 Nursing.

20 DATED this 19th day of December, 2003.

21 By:

22 
FREDERICK R. OLMSTEAD, ESQ.
23 General Counsel
Nevada State Board of Nursing
24 5011 Meadowwood Mall Way, Suite 201
Reno, Nevada 89502-6547
25 (775) 688-2620
26
27
28

BEFORE THE NEVADA STATE BOARD OF NURSING

IN THE MATTER OF)

CYNTHIA NORRIS-WILLIAMS)

REGISTERED NURSE)

NEVADA LICENSE NO.22460)

RESPONDENT)

ORDER OF PROBATION

CASE NO.0501-99C

The following is the order in Case Number 0501-99C by the Nevada State Board of Nursing:

ORDER

It is hereby ordered that Nevada Registered Professional Nurse license, in the name of Cynthia Norris-Williams, be revoked, provided, however, that execution of the order of revocation is stayed, and the license is placed on probation (Restricted Licensure) for a minimum of three (3) years with the following terms and conditions:

1. If, after notice and hearing, RESPONDENT is found to have violated any of the following terms and conditions, the BOARD may revoke probation for RESPONDENT and carry out the disciplinary order of revocation set forth herein. The Board shall have continuing jurisdiction over any complaint filed against RESPONDENT to revoke probation until such matter is final.

2. RESPONDENT shall submit reports, whether or not working, on his/her progress, his/her ability to handle stress, his/her mental and physical health, his/her current job duties and responsibilities, his/her ability to practice nursing safely and any changes in his/her plan for meeting the requirements of this Order.

3. RESPONDENT shall notify the Board, in writing of, and prior to, any change of address.

4. RESPONDENT shall, during the first year of this Order, attend a minimum of one meeting of the Nevada State Board of Nursing during which disciplinary hearings are held. This shall not include any meeting at which his/her own case is considered.

1 5. RESPONDENT shall only receive credit toward service of his/her probation period
2 while employed in a capacity for which a nursing license is required and subject to adequate super-
3 vision approved by the Board.

4 6. The BOARD shall approve all employment sites (changes in specialty and/or work
5 site or unit, including changes within the same facility or under the same employer) requiring a
6 nursing license prior to commencement of work. Approval is given through the Associate Executive
7 Director For Nursing Practice and the Disability Advisory Committee. RESPONDENT is required to
8 notify the Board in writing within seventy-two (72) hours after commencement or termination of any
9 nursing employment. Any notification regarding termination shall contain a full explanation of the
10 circumstances surrounding it.

11 7. RESPONDENT shall practice in accordance with the Nurse Practice Act and Board
12 established Standards of Practice. Respondent shall obey all federal, state, and local laws, employer
13 policy or contracts, and orders of the Board, pertaining to the practice of nursing in this state. Any and
14 all violations shall be reported by the Respondent to the Board in writing within seventy-two (72)
15 hours. It is the Respondent's responsibility to resolve with the Executive Director any confusion
16 regarding what laws pertain to nursing.

17 8. RESPONDENT shall be employed in a setting in which direction is provided by a
18 Registered Nurse. Direction shall mean: the intermittent observation, guidance and evaluation of the
19 nursing practice of another by a licensed registered professional nurse who may only occasionally be
20 physically present; the degree of direction needed shall be determined by an evaluation of the patient
21 care situation, and the demonstrated proficiency of the RESPONDENT.

22 9. RESPONDENT shall provide a copy of this Order to his/her employer and immediate
23 supervisor.

24 10. RESPONDENT shall cause his/her nursing supervisor (the person who is directly
25 responsible for everyday nursing functions) to submit a written report prior to the commencement of
26 employment. This report shall set forth:

- 27 a. Name and address of employer and name of immediate supervisor;
28

1 b. Duties and responsibilities to be carried out by Respondent;

2 C. Acknowledgement from the supervisor that this

3 D. Order has been read, that the role of the supervisor is understood, and that the
4 supervisor agrees to participate in the Respondent's probationary
5 requirements as outlined in this Decision and Order.

6 A report of this content shall be submitted by each additional or subsequent employer during the
7 entire probationary period and shall be due prior to the commencement of employment.

8 11. RESPONDENT shall cause his/her nursing supervisor to submit reports to the Board
9 addressing work attendance, reliability, ability to carry out assigned nursing functions, ability to
10 handle stress (changes in behavior patterns), ability to handle controlled substances when allowed to
11 by this Order, and any other information the employer or supervisor feels would assist the Board in its
12 ultimate review of Respondent's case. The supervisor shall include any infractions of laws, which
13 come to his/her attention, and any other relevant information.

14 12. RESPONDENT may not function as a supervisor, including as a head nurse or charge
15 nurse for a minimum of one (1) year and unless approved by the Associate Executive Director For
16 Nursing Practice and the Disability Advisory Committee.

17 13. RESPONDENT shall not work more than ninety (90) hours
18 in nursing in a two (2) week period. Changes in hours may be approved by the Associate Executive
19 Director For Nursing Practice and the Disability Advisory Committee.

20 14. RESPONDENT shall attend weekly meetings of a Board
21 approved Nurse Support Group and submit documentation to the Board of all meetings attended.
22 Changes in frequency of attendance may be approved by the Associate Executive Director For
23 Nursing Practice and the Disability Advisory Committee.

24 15. RESPONDENT shall meet with the Board or its representatives upon request and
25 shall cooperate with representatives of the Board in their supervision and investigation of
26 Respondent's compliance with the terms and conditions of this Order.

27 16. RESPONDENT shall be financially responsible for all requirements of this Order,
28

1 including any financial assessments by the Board for the cost of monitoring his/her compliance with
2 this Order.

3 17. RESPONDENT shall cause all reports to be in writing and submitted directly to the
4 Board on a quarterly basis unless otherwise specified. These reports shall begin one (1) month subse-
5 quent to the execution of this Order and are due no later than the last day of the month. It is the
6 obligation of the RESPONDENT to insure that all written reports are on time. The failure to submit
7 the reports on time may be considered a violation of this Order. Changes in the frequency of
8 reporting may be approved by the Associate Executive Director For Nursing Practice and the
9 Disability Advisory Committee.

10 18. RESPONDENT shall, upon execution of this Order, inform any other state board of
11 nursing in whose jurisdiction he/she has been issued a license (current or not), or in whose jurisdiction
12 he/she has applied for a license, or will apply for a license, of this Order. Respondent shall provide a
13 copy of this Order to said Board(s) of Nursing.

14 19. RESPONDENT acknowledges that if he/she should violate one or more of the terms
15 of probation, the Board may revoke, or invoke other appropriate discipline against his/her license to
16 practice nursing, subject only to the requirement that the BOARD shall, prior to such disciplinary
17 action, conduct a hearing in accordance with the Nevada Nurse Practice Act for the limited purpose
18 of establishing that there has, in fact, been a violation of the requirements of this Order. In the event
19 that a violation of the requirements is alleged, RESPONDENT agrees to surrender his/her license to
20 the Executive Director, if the Executive Director so requests, and refrain from practicing nursing until
21 entry of a final order of the Board or a court of competent jurisdiction, whichever last occurs, regard-
22 ing a potential violation. RESPONDENT agrees to waive his/her right to appeal the substantive legal
23 basis of the disciplinary action. In the event an alleged violation of probationary licensure is taken to
24 hearing and the facts which constitute the violation are determined to be not proven, no disciplinary
25 action shall be taken by the Board and the probationary licensure previously ordered by the Board
26 shall again be operative and in full force and effect.

27 20. RESPONDENT shall have his/her nursing license marked "RESTRICTED" through-
28

1 out the period of probation and until such time that the conditions of this Order are completed.

2 21. This Order shall cover any nursing license and/or certification issued by the State of
3 Nevada.

4 22. This Order will become part of the Respondent's permanent record, will become public
5 information, will be published with the list of disciplinary actions the Board has taken, and will be
6 reported to a national disciplinary databank, either the Healthcare Integrity and Protection Data Bank
7 or National Council State Boards of Nursing's Nursys. The Order may be used in any subsequent
8 hearings by the Board.

9 23. In the event other misconduct is reported to the Board this Order may be used as evidence
10 against the Respondent to establish a pattern of behavior and for the purpose of proving additional
11 acts of misconduct.

12 24. Upon completion of the requirements of this Order Decree, RESPONDENT shall
13 apply for termination of probation and issuance of unrestricted licensure on forms supplied by the
14 Board. RESPONDENT shall meet with the Associate Executive Director and the Disability Advisory
15 Committee for evaluation of compliance and recommendation for termination of probation. The
16 probation shall continue until terminated by the Board. The Board will determine whether or not
17 probation will be terminated.

18 NEVADA STATE BOARD OF NURSING retains jurisdiction in this case until all
19 conditions have been met to the satisfaction of the Board.

20 NEVADA STATE BOARD OF NURSING

21
22 Cookie Bible, APN
23 Cookie Bible, BSN, RN
24 Board President

25 Date 2/5/01

1 **BEFORE THE NEVADA STATE BOARD OF NURSING**

2
3
4 IN THE MATTER OF
5 CYNTHIA NORRIS-WILLIAMS, RN
6 LICENSED PROFESSIONAL NURSE
7 NEVADA LICENSE NO. RN22460
8 RESPONDENT

**FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND ORDER**

Case No. 0501-99C

9
10 On the 22nd day of January, 2004, a hearing was held in the above matter at the Nevada
11 State Board of Nursing (Board) at the Nevada State Museum and Historical Society, 700 Twin
12 Lakes Drive, Las Vegas, Nevada, in compliance with the provisions of Chapters 233B and 632
13 of the Nevada Revised Statutes (NRS) and Chapter 632 of the Nevada Administrative Code
14 (NAC).

15 Respondent, Cynthia Norris-Williams appeared in proper person. The Nevada State
16 Board of Nursing Staff appeared through counsel, Frederick R. Olmstead.

17 The Board having duly considered the testimony and exhibits and having fully considered
18 the law, and being fully advised herein, make the following Findings of Fact, Conclusions of
19 Law, and Order:

20 **FINDINGS OF FACT**

21 I.

22 At least twenty-one (21) working days prior to the date of the hearing, Respondent had
23 been noticed of the hearing by certified mail to Respondent's last known residential address.

24 II.

25 The Board had jurisdiction over the matter, and the Board could proceed to make a
26 determination in the matter.

27 ///

28 ///

1 III.

2 In January 2001, the Board accepted Respondent's Reinstatement of License and issued
3 an Order of Disciplinary Probation. The term of probation was to be three years.

4 IV.

5 Three of the conditions and terms of Respondent's probation were that Respondent must
6 submit quarterly self-reports; that Respondent attend a Nevada State Board of Nursing Board
7 meeting within the first year of the execution of the Order of Disciplinary Probation; and that
8 Respondent submit quarterly documentation verifying attendance at a Board approved Nurse
9 Support Group.

10 V.

11 Respondent admitted that she had failed to submit quarterly self-reports, failed to attend a
12 Board meeting, and failed to submit quarterly documentation verifying attendance at a Nurse
13 Support Group.

14 VI.

15 Respondent violated the terms and conditions of her probation, and therefore violated an
16 Order of the Board.

17 **CONCLUSIONS OF LAW**

18 1. Pursuant to NRS 632.320 and/or NAC 632.325 and/or NAC 632.926-927, the
19 Board may take disciplinary action against the Respondent based upon proof of a violation of
20 chapter 632 of the Nevada Revised Statutes and/or the Nevada Administrative Code.

21 2. Based on the evidence presented at the hearing, Respondent was found guilty of one
22 (1) count of violating NRS 632.320(14) because Respondent failed to comply with an order of the
23 Board.

24 ///

25 ///

26 ///

1 ORDER

2 Based on the foregoing Findings of Fact and Conclusions of Law and good cause
3 appearing therefore,

4 IT IS HEREBY ORDERED that, pursuant to NRS 632.320 and/or NAC 632.926(1)(h),
5 Respondent's Nevada License No. RN22460 is revoked. Respondent's Nevada License No.
6 RN22460 is revoked for a period of two (2) years.

7 IT IS FURTHER ORDERED that the revocation become part of Respondent's permanent
8 record, be published on the Board's list of disciplinary actions, and be reported to the appropriate
9 data banks.

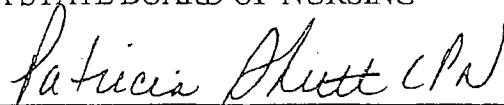
10 IT IS FURTHER ORDERED that, pursuant to NRS 632.325(1)(c), Respondent is
11 charged the costs associated with her hearing. The costs are due and payable within 120 days
12 from the date Respondent is sent an accounting of the costs by Board staff.

13 Pursuant to NRS 632.400(2), the ruling of the Board contained in these Findings of Fact,
14 Conclusions of Law, and Order shall take effect upon service to the Respondent or when the
15 Board receives a return from the United States Postal Service indicating the Respondent refused
16 service or could not be located. If no return is received by the Board, the order shall become
17 effective 30 days from the date of the order.

18 DATED this 29 day of January 2004.

19 NEVADA STATE BOARD OF NURSING

20
21 By:


22 PATRICIA SHUTT, L.P.N.
23 Board President
24
25
26
27
28